



BAILEY DUQUETTE P.C.

December 23, 2020

BY CM/ECF

The Honorable Gregory H. Woods
United States District Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: Linda Hirshman v. Don Franzen (20 Civ. 06322 (GHW))

Dear Judge Woods:

We represent Defendant Don Franzen. We write, with the express permission of Plaintiff's counsel, in connection with the Court's request that the parties provide a status update to the Court today on this matter, unless a Stipulation of Dismissal was earlier filed. (ECF Doc. No. 22).

The parties jointly report that significant progress has been made to formalize their global settlement. The parties are actively working through a remaining issue of particular complexity and hope to conclude that effort shortly. The parties jointly suggest that they provide a further status update to the Court on or before January 14, 2021, unless a Stipulation of Dismissal is filed earlier (as is expected).

The parties thank the Court for its continued attention to this matter.

Respectfully submitted,

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cc: Gabriel Levinson, Esq. (by ECF)
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